

Exhibit A1

BRANSTETTER, STRANCH & JENNINGS, PLLC

ATTORNEYS AT LAW

227 SECOND AVENUE NORTH

FOURTH FLOOR

NASHVILLE, TENNESSEE 37201-1631

TELEPHONE (615) 254-8801 ~ FACSIMILE (615) 250-3937

CECIL D. BRANSTETTER, SR.
C. DEWEY BRANSTETTER, JR.
RANDALL C. FERGUSON
R. JAN JENNINGS*
JOE P. LENISKI, JR.
DONALD L. SCHOLES
MIKE STEWART
JAMES G. STRANCH, III
J. GERARD STRANCH, IV
MICHAEL J. WALL

ASSOCIATES:
KARLA M. CAMPBELL
BEN GASTEL*
STACEY K. SKILLMAN **

OF COUNSEL:
ROBERT E. RICHARDSON, JR. ***

* ALSO ADMITTED IN GA
** ALSO ADMITTED IN KY
*** ONLY ADMITTED IN OH

October 7, 2013

VIA U.S. and ELECTRONIC MAIL

Yvonne Puig (yvonne.puig@nortonrosefulbright.com)
Norton Rose Fulbright (Fulbright & Jaworski LLP)
98 San Jacinto Blvd., Suite 1100
Austin, TX 78701

**Re: New England Compounding Center Litigation, MDL No. 2419
Discovery Requests**

Dear Yvonne:

Please find enclosed the common discovery requests propounded upon your clients and service copies of discovery served upon other defendants. You may return written discovery responses and responsive documents to me. Further, and pursuant to Judge Saylor's order of June 21, 2013 (Dkt. No. 192) and the PSC's subsequently filed notice (Dkt. No. 224), copies of responsive documents should be produced to the appropriate vendors. Enclosed herewith is U.S. Legal's production specs that should be used in producing responsive documents to that vendor.

Additionally, at yesterday's status conference we discussed with your local counsel a meet and confer about your responses to complaints. We are happy to discuss any specific proposal you have in mind and we are available to talk today or tomorrow about this.

Finally, we are planning on reserving the subpoena on Mr. Kelvas. Please let us know if you will accept service on behalf and provide dates when you are available for that deposition.



Should you have any questions or comments, please let me know.

Very truly yours,



J. Gerard Stranch, IV

JGS IV/bmc

Enclosures as stated

cc: Kristen Johnson Parker
Parties Listed on Certificate of Service on the Enclosed Discovery Requests